## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

	)
RONALD HEBERT and	) Case No. 1:17-cv-10922-DJC
AIME DENAULT On Behalf Of	
Themselves and Others Similarly Situated,	)
	)
Plaintiffs,	)
	)
v.	)
	)
VANTAGE TRAVEL SERVICE, INC.	
d/b/a VANTAGE DELUXE WORLD	
TRAVEL and VANTAGE	
ADVENTURES,	
Defendant.	
	)

DECLARATION OF ROBERT C. MUELLER
IN SUPPORT OF DEFENDANT'S RESPONSE TO PLAINTIFFS'
MOTION TO SUPPLEMENT RECORD CONCERNING PLAINTIFFS'
MOTION TO STRIKE/MOTION FOR PARTIAL SUMMARY JUDGMENT
AND DEFENDANTS' CROSS-MOTION TO SUPPLEMENT THE RECORD IN
OPPOSITION TO PLAINTIFFS' MOTION TO STRIKE/MOTION
FOR PARTIAL SUMMARY JUDGMENT

- I, ROBERT C. MUELLER on oath declare as follows:
- 1. I am an attorney duly admitted to practice law in the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.
- 2. I am one of the attorneys representing the defendant Vantage Travel Service, Inc. ("Vantage Travel") in the above-captioned matter.

- 3. I make this declaration in support of Vantage Travel's response to plaintiffs' motion to supplement record concerning plaintiffs' motion to strike/motion for partial summary judgment and defendants' cross-motion to supplement the record in opposition to same.
- 4. Attached hereto as Supplemental Declaration Exhibit 1 are true and accurate copies of selected pages from the February 20, 2019 deposition of the plaintiff Ronald Hebert.

SIGNED UNDER PAINS AND PENALTIES OF PERJURY THIS 20TH DAY OF MARCH, 2019.

/s/ Robert C. Mueller

Robert C. Mueller (BBO#567599) Email: <a href="mailto:rob.mueller@smithduggan.com">rob.mueller@smithduggan.com</a> SMITH DUGGAN BUELL & RUFO LLP 55 Old Bedford Road, Suite 300 Lincoln, MA 01773-1125

Tel: (617) 228-4453 Fax: (781) 259-1112

## **CERTIFICATE OF SERVICE**

I, Robert C. Mueller, hereby certify that this document is being filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be served upon those indicated as non-registered participants.

DATED: March 20, 2019

/s/ Robert C. Mueller

Robert C. Mueller